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*Attorneys for Bear Valley Road Partners LLC,
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Laguna Gateway Phase 2, LP,
Manteca Stadium Park, L.P., and OTR-Clairemont Square*

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

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In re: : **Chapter 11**
: **Case No. 08-35653-KRH**
CIRCUIT CITY STORES, INC. et al.. :
: **Jointly Administered**
Debtor. :
-----^X

MOTION FOR ADMISSION PRO HAC VICE

Constantinos G. Panagopoulos and Charles W. Chotvacs (the “Movants”), members in good standing with the State Bar of the Commonwealth of Virginia and attorneys admitted to practice before the United States District and Bankruptcy Courts for the Eastern District of Virginia, and attorneys with the law firm of BALLARD SPAHR ANDREWS & INGERSOLL, LLP, hereby respectfully move the Court pursuant to Local Rule 2090-1(E)(2) to enter an Order permitting Ivan M. Gold, attorney of, and Of Counsel to, the law firm ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS, LLP, to practice *pro hac vice* before this Court in the above-captioned matter on behalf of Bear Valley Road Partners LLC, GMS Golden Valley Ranch,

LLC, Laguna Gateway Phase 2, LP, Manteca Stadium Park, L.P., and OTR-Clairemont Square.

In support of this motion, movants state as follows:

1. Mr. Gold is a member in good standing of the bar of the State of California. Mr. Gold is admitted to practice before the United States District Court for the Central, Eastern, and Northern Districts of California. Mr. Gold received his J.D. from the University of California, Hastings College of the Law, and his B.S. from The American University. There are no disciplinary proceedings pending against Mr. Gold.

2. Mr. Gold understands that if he is admitted *pro hac vice* in this case, he will be subject to the disciplinary jurisdiction of this Court.

4. Movants request the Court to allow Mr. Gold to appear and be heard at hearings and on matters in this case, in association with movants, on behalf of Bear Valley Road Partners LLC, GMS Golden Valley Ranch, LLC, Laguna Gateway Phase 2, LP, Manteca Stadium Park, L.P., and OTR-Clairemont Square.

5. Pursuant to Local Rule 9013-1(G) and because there are no novel issues of law presented in this motion, movants request that the requirement that all motions be accompanied by a written memorandum of law be waived.

6. Pursuant to Local Rule 9013-1(L) and because this motion does not present contested issues, movants request that the Court rule upon the motion without an oral hearing.

7. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) counsel for the Debtors, and (c) all persons receiving electronic notice via the Court's CM/ECF system.

WHEREFORE, movants respectfully request that the Court enter an Order, substantially in the form attached hereto as Exhibit A, permitting Mr. Gold to appear *pro hac vice*, in association with movants, as counsel for Bear Valley Road Partners LLC, GMS Golden Valley Ranch, LLC, Laguna Gateway Phase 2, LP, Manteca Stadium Park, L.P., and OTR-Clairemont Square.

Respectfully submitted,

/s/ Charles W. Chotvacs

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December 3, 2008

*Counsel for Bear Valley Road Partners LLC,
GMS Golden Valley Ranch, LLC, Laguna
Gateway Phase 2, LP, Manteca Stadium
Park, L.P., and OTR-Clairemont Square*

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of December, 2008, the foregoing Motion for Admission *Pro Hac Vice* and Proposed Order, were filed and served electronically using the Court's CM/ECF system, and that, in addition, true and correct copies of the foregoing were mailed, First-Class postage prepaid, to the following parties:

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/s/ Charles W. Chotvacs
Charles W. Chotvacs